

COHEN & GREEN

February 1, 2024

BY ECF

Hon. Frederic Block
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Acosta, et al., v. City of New York, 22-cv-0576

Dear Judge Block:

This firm along with co-counsel represents the Plaintiffs. We write to respectfully request a 60-day extension of time to file our fee application from the current deadline of February 9, 2024, up to and including April 9, 2024. This is the second such request and the Defendants consent. The reason for this request is because Defendants have not yet responded to Plaintiffs' November 28, 2023 fee demand, which also included counsel's timesheets. Michael Pesin-Virovets, counsel for the Defendants, has stated he hopes to have authority by February 8th. At that time, the parties may need to engage in further negotiations, requiring this further extension.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Jessica Massimi

Pronouns: She/Her

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by ECF.